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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

THE STATE OF CALIFORNIA et al.,
Plaintiffs,
v.
INFINEON TECHNOLOGIES AG et al.,
Defendants.

Case No. C 06-4333 PJH
Related to MDL No. 1486

**Stipulation and [Proposed] Order to
Allow Filing of Errata to the Expert
Reply Report of Dr. Kenneth Flamm
in Support of Motions for the
Certification of Governmental Entity
Classes**

Plaintiffs the State of California, the City and County of San Francisco, the County of Santa Clara, the Los Angeles Unified School District, the State of New Mexico and the County of Sandoval (hereinafter collectively referred to as "Class Representatives") and defendants Hynix Semiconductor, Inc. and Hynix Semiconductor America, Inc., on behalf of all defendants, stipulate and agree that Class Representatives may file the Errata to the Expert Reply Report of Dr. Kenneth Flamm in Support of Motions for the Certification of Governmental Entity Classes, a true and correct copy of which is attached hereto and designated Exhibit A.

Dated: April 9, 2008

EDMUND G. BROWN JR.
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Attorneys for the State of California

By: /s/ Steven H. Bergman
Steven H. Bergman
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Counsel for Defendants:
Hynix Semiconductor, Inc. and
Hynix Semiconductor America, Inc.

I, Charles M. Kagay, attest that concurrence in the filing of the document has been obtained from each of the other signatories.

By: /s/ Charles M. Kagay
Charles M. Kagay

ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES IS IT SO ORDERED.

Dated: April 15, 2008



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**Errata to the Expert Reply Report of
Dr. Kenneth Flamm in Support of
Motions for the Certification of
Governmental Entity Classes**

On March 19, 2008, plaintiffs the State of California, the City and County of San Francisco, the County of Santa Clara, the Los Angeles Unified School District, the State of New Mexico and the County of Sandoval filed the Expert Reply Report of Dr. Kenneth Flamm in Support of Motions for the Certification of Governmental Entity Classes. Following the filing of the Expert Reply Report, Dr. Flamm discovered that the report contains several typographical errors that should be corrected. These errors and their corresponding corrections are as follows:

1. Page 7, footnote 3, lines 1-2, which state “Steven Appleton, CEO of Micron Technology, testifying before the U.S. International Trade Commission on **June 23, 2003**”, should be corrected to state “Steven Appleton, CEO of Micron Technology, testifying before the U.S. International Trade Commission on **June 24, 2003**”.

2. Page 7, footnote 3, lines 6-8, which state “Farhad Tabrizi of Hynix, testifying on **June 23, 2002**: ‘On an average, we can reduce the cost or price by about 40 percent per year.’ USITC Hearing of **June 23, 2002**, at page 255, lines 14-16 ”, should be corrected to state “Farhad Tabrizi of Hynix, testifying on **June 24, 2003**: ‘On an average, we can reduce the cost or price by about 40 percent per year.’ USITC Hearing of **June 24, 2003**, at page 255, lines 14-16 .”

3. Page 24, line 3, which states “PCs – would not have been perfectly **elastic**”, should be corrected to state “PCs – would not have been perfectly **inelastic**”.

4. Page 32, lines 21-22, which state “It is indeed much larger than producers’ **gross** profit margins on these DRAM-using products”, should be corrected to state “It is indeed much larger than producers’ **net** profit margins on these DRAM-using products”.

5. Page 43, in the table entitled “Low and High End Entities in California Use Similar Purchase Mechanisms for IT Products,” the entry “Highway Patrol Districts” (the sixth entry in the first column) should be followed immediately by a footnote which states “CA Highway Patrol procurement is not identifiable by district in reports reviewed.”

6. Page 44, in the table entitled “Low and High End Entities in New Mexico Use Similar Purchase Mechanisms for IT Products,” the entry “State Police” (the sixth entry in

1 the first column) should be followed immediately by a footnote which states “NM State
2 Police procurement is not identifiable by district in reports reviewed.”

3 7. Page 44, line 24, which states “**(Tab 13)**”, should be corrected to state “**(Tab 13**
4 **and backup materials at Tab 13a WSCA-Alpine-Lassen comparison.xls and Tab 13b**
5 **WSCA-examples.xls)**”.

6 8. Tab 1, p. 1, lines 3-4, which state “From testimony under penalty of perjury at
7 US International Trade Commission hearing, Washington, **June 23, 2003**”, should be
8 corrected to state “From testimony under penalty of perjury at US International Trade
9 Commission hearing, Washington, **June 24, 2003.**”

10 Dated: April 9, 2008

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